

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE:	:	
	:	Chapter 13
BARBARA J. PARKER	:	
	:	Case No. 22-13138-MDC
Debtors.	:	

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**DEBTORS' RESPONSE TO MOTION FOR RELIEF FROM STAY**

BARBARA J. PARKER (the "Debtor"), hereby files this Response to the Motion of Wilmington Savings Fund Society, FSB, D/B/A Christiana Trust, not individually but as trustee for Pretium Mortgage Acquisition Trust (the "Movant"), for Relief from the Automatic Stay (the "Motion"), and in support thereof respectfully state the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Denied. It is specifically denied that the Debtor has filed to make monthly post-petition payments to the Movant.
11. Denied. It is specifically denied that the Debtors have accrued post-petition arrears to the Movant in the amount of \$4,662.26 with a suspense balance of \$1,552.58.

12. Denied. It is specifically denied that the current unpaid balance under the loan with Movant is \$201,669.37. It is further denied that the Movant's total claim is \$252,050.42.

13. Admitted.

14. Denied. It is specifically denied that either (a) cause exists warranting relief from the automatic stay; or (b) the Movant lacks adequate protection warranting relief from the automatic stay under 11 U.S.C. § 362(d)(1).

15. Denied. It is once again specifically denied that the Debtor has defaulted in making post-petition payments to the Movant.

16. Denied. It is specifically denied that cause exists under either 11 U.S.C. § 362(d) or 11 U.S.C. § 1301 warranting relief from the automatic stay.

17. Denied. It is specifically denied that the Movant is entitled to a waiver of Bankruptcy Rule 4001(a)(3).

WHEREFORE, the Debtor respectfully requests this Honorable Court enters an Order denying the Motion for Relief from the Automatic Stay, and for such other and further relief as the Court deems just and appropriate.

Dated: June 16, 2023

Respectfully submitted,

/s/ Brad J. Sadek  
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